IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

Master File No. 2:12-MD-02327 MDL No. 2327

THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO

JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the "Ethicon Defendants"), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). Other defendants remain and the case should remain open. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Mark W. Davis
Mark W. Davis
Martin Daniel Crump
Davis & Crump
2601 14th Street
Gulfport, MS 39501
(228) 863-6000
mark.davis@daviscrump.com
martincrump@daviscrump.com
Counsel for Plaintiffs

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street
Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338

(304) 414-1800 srobinson@tcspllc.com Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A

| Civil Action No. | <u>Case Style</u> |
|------------------|--|
| | Kathy Allen v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; Boston |
| 2:12-cv-09549 | Scientific Corporation |
| | Dale Aucoin v. Ethicon Inc.; Johnson & Johnson; Boston Scientific |
| 2:14-cv-27290 | Corporation |
| | Billie Cape v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; Boston |
| 2:12-cv-09457 | Scientific Corporation |
| | Carrie Chiles v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; Boston |
| 2:13-cv-03484 | Scientific Corporation |
| | Holly Duncan v. Ethicon Inc.; Johnson & Johnson; Boston Scientific |
| 2:14-cv-30413 | Corporation |
| | Deborah Edwards v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; |
| 2:14-cv-10663 | Boston Scientific Corporation; Coloplast Corp. |
| | Annie P. Finley v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; C.R. |
| 2:12-cv-07354 | Bard, Inc.; Tissue Science Laboratories Limited |
| | Linda Fletcher v. Ethicon Inc.; Johnson & Johnson; Boston Scientific |
| 2:14-cv-20022 | Corporation |
| | Gayla Forcum and Larry Forcum v. Ethicon Inc.; Ethicon, LLC; Johnson |
| 2:13-cv-22275 | & Johnson; Boston Scientific Corporation |
| | Elizabeth Harris v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; |
| 2:14-cv-10606 | Boston Scientific Corporation |
| | Kathaleen Illig and Joseph Illig v. Ethicon Inc.; Johnson & Johnson; |
| 2:13-cv-30697 | Boston Scientific Corporation |
| | Tamara Kirschbaum and Allan Kirschbaum v. Ethicon Inc.; Ethicon, |
| 2:13-cv-06726 | LLC; Johnson & Johnson; Coloplast Corp. |
| | Brenda Mason and H. Norden VanHorne v. Ethicon Inc.; Ethicon, LLC; |
| 2:13-cv-17137 | Johnson & Johnson; Mentor Woldwide LLC; Coloplast Corp. |
| | Doris Parnell and Harry Parnell v. Ethicon Inc.; Ethicon, LLC; Johnson & |
| 2:13-cv-14083 | Johnson; Boston Scientific Corporation |
| | Tonja Pavich v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; Boston |
| 2:13-cv-05910 | Scientific Corporation |
| | Judy Smoot v. Ethicon Inc.; Johnson & Johnson; Boston Scientific |
| 2:14-cv-24387 | Corporation; Coloplast Corp. |
| | Tina Stem v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; Coloplast |
| 2:12-cv-08015 | Corp. |
| | Anita Trout and Thomas Trout v. Ethicon Inc.; Ethicon, LLC; Johnson & |
| 2:14-cv-15072 | Johnson; Boston Scientific Corporation |
| | Susan G. Unger v. Ethicon Inc.; Johnson & Johnson; Boston Scientific |
| 2:14-cv-26954 | Corporation |
| | Anna Kate Uridel and Richard Uridel v. Ethicon Inc.; Ethicon, LLC; |
| 2:12-cv-06360 | Johnson & Johnson; Boston Scientific Corporation |

| | Helen Wieczkiewicz v. Ethicon Inc.; Ethicon, LLC; Johnson & Johnson; |
|---------------|--|
| 2:13-cv-00863 | Boston Scientific Corporation |
| | Sharron Winstead v. Ethicon Inc.; Johnson & Johnson; Boston Scientific |
| 2:13-cv-05907 | Corporation |